

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA DIVISION

In re:	)	
YVETTE JOHNSON	)	
WALTER JOHNSON	)	CHAPTER 13
<b><u>Debtor(s)</u></b>	)	
	)	Case No.: 17-10821 (AMC)
CREDIT ACCEPTANCE CORPORATION	)	
<b><u>Moving Party</u></b>	)	
v.	)	11 U.S.C. 362
	)	
YVETTE JOHNSON	)	
WALTER JOHNSON	)	
<b><u>Respondent(s)</u></b>	)	
	)	
WILLIAM C. MILLER	)	
<b><u>Trustee</u></b>	)	

**CERTIFICATION OF DEFAULT BY DEBTORS IN VIOLATION OF STIPULATION  
APPROVED ON AUGUST 24, 2017 AND EX PARTE REQUEST FOR RELIEF FROM  
THE AUTOMATIC STAY**

Comes now Credit Acceptance Corporation ("Credit Acceptance") filing this Certification of Default and ex parte request for relief from the automatic stay and hereby certifies;

1. That on August 24, 2017, the Court entered an Order approving a Stipulation providing for an arrearage cure, monthly payments to Credit Acceptance, and for relief from the automatic stay under certain circumstances.
2. Paragraph three (3) of the Stipulation provides that the Debtors are to cure arrears by making their regular monthly payment of \$411.43 plus an additional \$362.79 (total payment of \$774.22) per month for the months of June through November 2017 (6 month cure) directly to Credit Acceptance.
3. Paragraph four (4) of the Stipulation provides that commencing June 2017, if the Debtors fail to make any payment to Credit Acceptance within thirty (30) days after it falls due, Credit Acceptance may send, via facsimile and regular mail, the Debtors and counsel a written notice of default of this Stipulation. If the default is not cured within ten (10) days of the date of the notice, counsel may file a Certification of Default with the Court and serve it on all interested parties, and the Court shall enter an Order granting relief from the automatic stay.

4. In violation of the Stipulation, the debtors had failed to make any payments for June and July, for a total default in the amount of \$1,548.44 through July 2017.
5. On August 23, 2017, Credit Acceptance served a 10-day default letter on the debtors and their attorney in accordance with the terms of the Stipulation. Since that date, a payment of \$1,300.00 was made on September 11, 2017, and the payments of \$774.22 each fell due for August and September 2017, resulting in a total default through September 2017 in the amount of **\$1,796.88**. In addition, the payment of \$774.22 for October 2017 fell due on October 27, 2017 and remains unpaid.
6. As a result of the defaults stated in paragraph four (4) of this Certification, Credit Acceptance is entitled to stay relief a in regards to personal property described as a 2013 Nissan Sentra bearing vehicle identification number 3N1AB7AP2DL782803.

Respectfully submitted:

/s/ William E. Craig

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Local Counsel for Credit Acceptance Corporation